

# Consultation response form

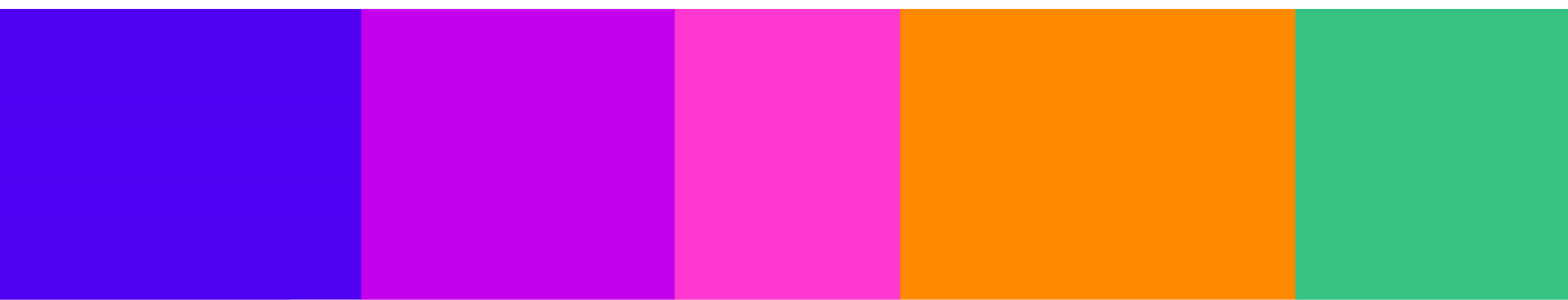
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<b>Consultation title</b>	How to promote Media Literacy: Consultation on recommendations for online platforms, broadcasters and services
<b>Full name</b>	Professor Lee Edwards and Emma Goodman
<b>Contact phone number</b>	
<b>Representing (delete as appropriate)</b>	Self
<b>Organisation name</b>	London School of Economics and Political Science
<b>Email address</b>	

## Confidentiality

We ask for your contact details along with your response so that we can engage with you on this consultation. For further information about how Ofcom handles your personal information and your corresponding rights, see [Ofcom's General Privacy Statement](#).

<b>Your details: We will keep your contact number and email address confidential. Is there anything else you want to keep confidential? Delete as appropriate.</b>	Nothing
<b>Your response: Please indicate how much of your response you want to keep confidential. Delete as appropriate.</b>	None
<b>For confidential responses, can Ofcom publish a reference to the contents of your response?</b>	n/a



## Your response

Question	Your response
<p><b>Question 1:</b> Is it clear which types of organisations the 10 proposed recommendations are aimed at? Please provide reasons and evidence to support your answer.</p>	<p>Confidential? – N</p> <p>Yes, it is generally very clear, although defining what constitutes a ‘significant’ UK audience would enhance clarity.</p>
<p><b>Question 2:</b> Do you have any comments on whether they should apply to all organisations, including those of different sizes and operating models? Please provide reasons and evidence to support your answer.</p>	<p>Confidential? – N</p> <p>The recommendations should apply to all organisations. There doesn’t seem to be any obvious reason why recommendations 6 and 7 are more narrowly targeted and given that the recommendations are not mandatory, it seems most sensible to propose them all to all services, with the caveat that their implementation can be tailored to each organisation’s focus/business, and to their capacity in relation to their size.</p>
<p><b>Question 3:</b> Do you have any comments on the proposed recommendations? Please provide comments in particular on their effectiveness, applicability or risks. Please provide evidence to support your answer.</p>	<p>Confidential? – N</p> <p>Overall, the recommendations offer valuable suggestions to improve the media literacy provision of platforms and content providers.</p> <p>There is an overall emphasis on targeted organisations publishing information, making certain information visible in the service, or designing content in particular ways. There is no requirement to first discuss with audiences (or knowledgeable third parties) how they might want information to be made available, what would make them use it, or what they actually require to meet needs such as ‘empowerment’ or ‘meaningful choice’. This means the recommendations are likely to have the effect of making organisations more focused on their own activities and what they are ‘outputting’, rather than on the actual needs of their audiences. This imbalance needs to be addressed.</p> <p>The recommendations are connected, but these connections are not explicitly made, resulting in the risk that they may be approached in an uncoordinated way that</p>

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	<p>reduces the overall impact of activity (e.g. if parental/caregiver support is not connected to #3). If the connections were made more explicit through a directive paragraph explaining how work in one area could enhance outcomes in another, this would create a more visionary 'bigger picture' for service providers to buy into, and potentially reduce a 'compliance' orientation to the recommendations.</p> <p>Comments on specific recommendations:</p> <p><i>Recommendation 1:</i> While we very much welcome the focus on embedding media literacy by design in services, particularly when these are likely to be used by children, we would suggest that the recommendation should specifically call for an approach that also embeds child rights by design (see work by the Digital Futures Commission) and looks at how these are linked to digital skills and literacy (see work by the ySkills project).</p> <p><i>Recommendation 5:</i> While it is extremely valuable to support parents, it is important not to put the onus on parents to understand tools and services that are not designed to be easily understood, and to protect their children from services that are deliberately designed to be addictive. Research carried out by our colleagues (Stoilova, Bulger, Livingstone, 2023) suggests that parental control tools should not be used as a standalone strategy for protecting children online, as evidence points to these tools having both beneficial and adverse outcomes, limiting other outcomes or simply having no outcomes. This suggests that safety defaults are even more important, as are the principles of child rights by design. In addition, this recommendation could be adapted to focus on a broader range of vulnerable audiences and anyone with a duty of care towards them.</p> <p><i>Recommendation 6:</i> This recommendation seems to be focused on delivering information to audiences in a timely way, even though the value of the organisations named in the clauses is in implementation and delivery, as well as knowledge of their audiences. This seems to be a missed opportunity to leverage the skills and knowledge across the media sector and make them more visible to services. We propose being more ambitious about the intent here, and recommending active</p>

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	<p>collaboration in delivering media literacy programmes, based on the needs of the third-party organisations and their audiences.</p> <p><i>Recommendation 8:</i> Given the emphasis put on lack of funding as a key challenge for media literacy providers in our 2023 stakeholder research (Edwards et al, 2023), we would encourage further detail of what qualifies as ‘long term’ funding, and ensuring that such funding is transparent and provided in a way that limits any impact on the independence of stakeholders.</p>
<p><b>Question 4:</b> Are there any other additional recommendations you think we should consider? If so, please provide evidence to support your comment.</p>	<p>Confidential? – N</p> <p>Given that there is no guarantee that users read documentation from services, or follow instructions or prompts that might help protect them or explain the information they are encountering, services will need to do more to ensure the measures they take are effective (and the investment they make is worthwhile). We therefore propose that there be an additional recommendation that specifies engaging with audiences to understand their needs in relation to media literacy elements (both from a protectionist and empowerment perspective), on a regular basis and at key inflections in service points (e.g. the introduction of a new service, a change in service design or user journey through the service). This recommendation should also specify engaging with groups that have particular needs (e.g. children, minoritised or vulnerable groups, the elderly, people with disabilities).</p> <p>Given that these recommendations are about behaviours that do not constitute part of organisations’ competitive activity, we propose an explicit recommendation that encourages cross-industry collaboration and information-sharing (e.g. across organisations providing similar services, where mutual knowledge of best practices could support a more standardised experience for users, and build media literacy habits into service use across all providers). Scaling up efforts through collaboration may also help smaller organisations to increase the impact of work that would otherwise be limited by their own budget and resource, and avoid duplication of effort. Point 4.56 recommends collaboration, but not with</p>

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	<p>other services, only with organisations outside the service. It is also located under recommendation 9, but this limits its value as a general approach that could support efforts to take up other recommendations in the list.</p> <p>In recommendation 10, there is no requirement that publication of evaluations be accessible to users, which effectively removes user accountability from the responsibilities implied by the recommendations. We propose that a clause be included for this recommendation, that explicitly requires evaluations and reporting to be accessible to non-specialist audiences, and to audiences with specific needs (e.g. children, people with disabilities, ESL). We would also recommend that the reports be proactively circulated not only to Ofcom, but also to key actors in the media literacy sector (e.g. associations such as MILA, NCEA, CILIP) so that they are aware of the measures being taken and their effectiveness, and can incorporate this information as needed in their provision.</p> <p>While there is a recommendation to help users understand how recommender algorithms work, there is no recommendation to publish how advertisers leverage those recommendation algorithms and why they do so (ie to target audience behaviours and thinking). Hardy et al (2024, 2025) demonstrate the scale of this content and the impact it has on the media ecosystem that users are exposed to. This needs to be built into the recommendations if users are to be fully aware of the persuasive architecture they are engaging with. We therefore also propose that a recommendation be included that advertising and promotional content is flagged by default, so that users can distinguish it from other types of content.</p> <p>The recommendations assume that access to media is a given; this is not always the case, with 2024 research led by Good Things Foundation showing that availability and cost of devices are still a limitation to spending time online for significant numbers of people, in addition to challenges posed by a lack of digital skills. We therefore propose an additional recommendation, or additional wording within the recommendations, that explicitly addresses access to media, not only in the form of skills, but also in terms of support for basic access to devices</p>

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	(e.g. by supporting third party organisations to provide such access).
<p><b>Question 5:</b> Do you have any examples or suggestions of ways of encouraging services to adopt these recommendations?</p>	<p>Confidential? – N</p> <p>At the moment there are a number of elements that assume a certain level of knowledge on the part of organisations about what is expected, what is needed or how to define the focus of each recommendation. For example, what does ‘empower’, ‘support’ and ‘meaningful’ mean in #5? What does ‘empower, engage and enable’ third parties mean in #6? These terms need more precise definition, perhaps by giving additional examples of what they might mean for different services, or different audiences. Offering illustrative examples of best practice (for example, from the Ofcom library or other academic research) would also be useful.</p> <p>The recommendations are grounded in an assumption that users have certain rights when they use media (or, alternatively, that media literacy is about empowering in the context of rights that one should be able to realise in the media environment). Therefore, reference points for minimum standards or that can serve as a starting point for understanding what these rights are, are needed to contextualise the recommendations and encourage services to take a wider view of the potential benefits of their actions. For example, when designing services or providing support for young people, the UN Convention on the Rights of the Child and General Comment 25 could be included as a starting point for organisations to know what kinds of abilities and capabilities they should be fostering among their users. Inclusive design could be informed by the UN Convention on the Rights of Persons with Disabilities (the obligations section).</p> <p>The idea of ‘proportionality’ is rather general – can this be operationalised not only in financial terms, but also in terms of staff commitment (e.g. appointing a person or organisational function to manage the partnerships mentioned in #6 and #8)?</p> <p>The audiences specified in the recommendations appear to be a mainly binary grouping of adults and children. More emphasis could be given to the recommendations</p>

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	on design for people with disabilities, elderly people, and vulnerable adults – for example, by adding a paragraph similar to 4.9 for these groups.
<p><b>Question 6:</b> Do you have any comments on our impact assessment, rights assessment, equality impact assessment and Welsh language assessment? Please provide evidence in support your answer.</p>	<p>Confidential? – N</p> <p>No comments.</p>

**Please tell us how you came across about this consultation.**

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- Found it on Ofcom's website
- Found it on another website
- Heard about it on TV or radio
- Read about it in a newspaper or magazine
- Heard about it at an event
- Somebody told me or shared it with me
- Other (please specify)

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